

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**[PROPOSED] ORDER GRANTING DEFENDANT'S
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

AND NOW, this _____ day of _____, 202__, upon consideration of Defendant Google LLC's Motion to Retain Documents Under Seal, Memorandum of Law in Support, supporting Declarations, and any opposition and reply thereto, IT IS HEREBY ORDERED that:

1. Google's request to retain under seal limited information redacted from the version of Plaintiff's Memorandum of Law In Support of Plaintiff's Motion for Summary Judgment and In Opposition to Google's Motion for Summary Judgment (ECF 153), submitted as Exhibit A to the Declaration of Sara B. Tomezsko, is GRANTED;

2. Google's request to retain under seal limited information redacted from the version of Plaintiff's Response to Google's Rule 56.1 Statement In Support of Google's Motion for Summary Judgment (ECF 154), submitted as Exhibit B to the Declaration of Sara B. Tomezsko, is GRANTED;

3. Google's request to retain under seal limited information redacted from the

version of Plaintiff's Affirmative Rule 56.1 Statement in Support of Plaintiff's Motion (ECF 155), submitted as Exhibit C to the Declaration of Sara B. Tomezsko, is GRANTED;

4. Google's request to retain under seal limited information redacted from the version of the Declaration of Cara E. Greene (ECF 156), submitted as Exhibit D to the Declaration of Sara B. Tomezsko, is GRANTED;

5. Google's request to retain under seal the version of Exh. 1 to the Declaration of Maya S. Jumper ("Jumper Decl.") (ECF 160-1, corrected and re-submitted as ECF 169) submitted as Exhibit E to the Declaration of Sara B. Tomezsko, is GRANTED;

6. Google's request to retain under seal Jumper Decl., Exh. 2 (ECF 160-2), is GRANTED;

7. Google's request to retain under seal Jumper Decl., Exh. 3 (ECF 160-3), is GRANTED;

8. Google's request to retain under seal limited information redacted from the version of Jumper Decl., Exh. 4 (ECF 160-4, corrected and re-submitted as ECF 169-1) submitted as Exhibit F to the Declaration of Sara B. Tomezsko, is GRANTED;

9. Google's request to retain under seal Jumper Decl., Exh. 6 (ECF 160-6), is GRANTED;

10. Google's request to retain under seal Jumper Decl., Exh. 8 (ECF 160-8), is GRANTED;

11. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 9 (ECF 160-9), is GRANTED;

12. Google's request to retain under seal limited information redacted from the version of Jumper Decl., Exh. 10 (ECF 160-10, corrected and re-submitted as ECF 169-2) submitted as Exhibit G to the Declaration of Sara B. Tomezsko, is GRANTED;

13. Google's request to retain under seal limited information redacted from the version of Jumper Decl., Exh. 18 (ECF 160-18, corrected and re-submitted as ECF 169-3) submitted as Exhibit H to the Declaration of Sara B. Tomezsko, is GRANTED;

14. Google's request to retain under seal portions of Jumper Decl., Exh. 22 (ECF 160-22), is GRANTED;

15. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 25 (ECF 160-25) submitted as Exhibit I to the Declaration of Sara B. Tomezsko, is GRANTED;

16. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 30 (ECF 160-30), is GRANTED;

17. Google's request to retain under seal limited information redacted from the version of Jumper Decl., Exh. 34 (ECF 160-34) submitted as Exhibit J to the Declaration of Sara B. Tomezsko, is GRANTED;

18. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 42 (ECF 160-42) submitted as Exhibit K to the Declaration of Sara B. Tomezsko, is GRANTED;

19. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 50 (ECF 160-50) submitted as Exhibit L to the Declaration of Sara B. Tomezsko is GRANTED;

20. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 53 (ECF 160-53), is GRANTED;

21. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 56 (ECF 160-56), is GRANTED;

22. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 57 (ECF 160-57), is GRANTED;

23. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 59 (ECF 160-59) submitted as Exhibit M to the Declaration of Sara B. Tomezsko is GRANTED;

24. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 60 (ECF 160-60), is GRANTED;

25. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 61 (ECF 160-61) submitted as Exhibit N to the Declaration of Sara B. Tomezsko is GRANTED;

26. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 67 (ECF 160-67), is GRANTED;

27. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 69 (ECF 160-69), is GRANTED;

28. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 71 (ECF 160-71, corrected and re-submitted as ECF 169-7), is GRANTED;

29. Google's request to retain under seal limited information redacted from the

version of the Jumper Decl., Exh. 79 (ECF 160-79) submitted as Exhibit O to the Declaration of Sara B. Tomezsko is GRANTED;

30. Google's request to retain under seal limited information redacted from the version of the Jumper Decl., Exh. 90 (ECF 160-90) submitted as Exhibit P to the Declaration of Sara B. Tomezsko is GRANTED;

31. Google's request to retain under seal limited information redacted from Jumper Decl., Exh. 93 (ECF 160-93), is GRANTED;

32. Google's request to retain under seal limited information redacted from the version of Jumper Decl., Exh. 95 (ECF 160-95) submitted as Exhibit Q to the Declaration of Sara B. Tomezsko is GRANTED; and

33. Plaintiff is reminded of her obligations under the Protective Order.

Plaintiff is hereby directed to re-file documents submitted in connection with Plaintiff's Motion for Summary Judgment and Opposition to Google's Motion for Summary Judgment (ECF 152 *et seq.*) consistent with this order.

IT IS SO ORDERED.

Honorable Lorna G. Schofield
United States District Judge